program of allowing <u>the terminal device</u> to access the data storing unit to read and write the various types of data via the interface; and a program of executing a process to implement a function of the data processing device that is indicated by the instruction data when the instruction data is stored in the storing unit," as recited in independent claim 13; and "a program of enabling the <u>terminal device</u> to recognize a data storing unit of the data processing device as an external storage device so as to enable the <u>terminal device to be accessible to the data storing unit</u> ... [and] a program of storing the instruction data into the storing unit of the data processing device via the interface," as recited in independent claim 14 (emphasis added).

The Office Action asserts that the PC card controller 88, memory card and scan/print job command file of Murata correspond to the claimed terminal device, storage unit, and instruction data, respectively, of independent claims 1, 13 and 14 (see Office Action, pages 2 and 3). However, the PC card controller 88 of Murata does not store the alleged instruction data into the memory card (see col. 7, lines 63-65 and col. 8, lines 28-31 of Murata). Rather, the print job command file of Murata is previously stored onto the memory card and thereafter the memory card is inserted into the user's computer (see col. 7, lines 63 - col. 8, line 2; and col. 8, lines 28-31). Therefore, Murata does not disclose <u>the terminal device</u> storing the instruction data in the storage unit, as generally recited in independent claims 1, 13 and 14.

Based on the Office Action's own interpretation, in order for the PC card controller 88 to correspond to the claimed terminal device, the instruction data must be stored on the memory card that is later inserted into the PC card slot <u>by the PC card controller 88</u> (i.e. the alleged terminal device). Assuming, *arguendo*, that this interpretation is reasonable, the digital copying machine of Murata would not execute any process to implement a particular function <u>at a time when the alleged instruction data is stored on the memory card</u>. Rather, the

user would still be required to insert the memory card into the printer device before any function could be implemented. Therefore, even assuming the Office Action's interpretation is reasonable, Murata still would not teach or render obvious "a function implementing unit that executes a process ... when the instruction data is stored in the storing unit by the terminal device," as recited in independent claim 1 and as similarly recited in independent claim 14 (emphasis added).

Murata also does not teach or render obvious "an instruction data generating unit that receives user operations and generates the instruction data instructing the data processing device to implement the function," as recited in independent claim 8.

The Office Action asserts that the claimed instruction data generating unit is taught by col. 7, lines 2-7 of Murata (see Office Action, page 4). This portion of Murata is reproduced below:

> An offline print function in the digital copying machine of this embodiment will be described. A user previously installs his memory card in the digital copying machine and downloads a print function information file to the memory card. An example of the content of the print function information file is shown in Fig. 3.

The Office Action is apparently asserting that the process of downloading a print function information file from the digital copying machine to the memory card reasonably corresponds to the claimed instruction data generating unit. However, as discussed above, the Office Action also asserts that the PC card controller 88, not the digital copying machine, corresponds to the claimed terminal device (see Office Action, page 4). The digital copying machine (i.e., the alleged instruction data generating unit) is not part of the PC card controller 88 (i.e., the alleged terminal device) as required by claim 8. Therefore, Murata does not teach "an instruction data generating unit that receives user operations and generates the instruction

data instructing the data processing device to implement the function," as recited in independent claim 8.

Further, in Murata, the PC card controller 88 controlling an access from the CPU 85 to a memory card and the process of downloading the print function information file are performed independently of each other. The PC card controller 88 is not involved with generating the print function information file in any way. The print job information file is previously downloaded onto the memory card well before the memory card is inserted into the user's computer (see col. 7, line 60 - col. 8, line 2 of Murata). Therefore, Murata does not teach "A terminal device ... comprising ... an instruction data generating unit that receives user operations and generates the instruction data instructing the data processing device to implement the function," as recited in independent claim 8.

Further, the Office Action asserts that the CPU bus 83 of Murata corresponds to the interface of independent claims 1, 8, 13 and 14 (see Office Action, page 2). However, one of ordinary skill could not reasonably equate a CPU bus to an interface. A bus and interface provide different functions in circuitry and thus an interface cannot be replaced by a bus, and vice versa. Accordingly, the Office Action is providing an unreasonably broad interpretation by interpreting the CPU bus 83 of Murata to correspond to the claimed interface.
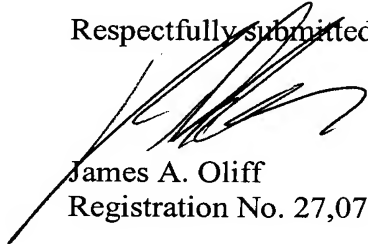
Yoneta does not remedy the above-described deficiencies of Murata.

Therefore, for at least these reasons, independent claims 1, 8, 13 and 14 are patentable over the applied references. Claims 2-7, 9-12 and 15-18, which variously depend on independent claims 1 and 8, are also patentable for at least their dependency on independent claims 1 and 8, as well as for the additional features they recite. Applicant thus respectfully requests withdrawal of the rejections.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

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